



February 17, 2021

Via Email/Sharefile

Mr. Andrew Park
Hazardous Waste Programs Branch
US Environmental Protection Agency Region 2
290 Broadway, 22nd Floor
New York, New York 10007-1866

**Re: 11/17/2020 Response to SI Comment Letter (12/6/2018)
Hess Corporation Former Port Reading Complex (Site)
750 Cliff Road
Woodbridge, Middlesex County, New Jersey
NJDEP PI# 006148
ISRA Case No. E20130449
EPA ID No. NJD045445483**

Dear Mr. Park:

Earth Systems, Inc. (Earth Systems) has prepared this letter response on behalf of Hess Corporation (Hess) regarding the inquiries provided by the New Jersey Department of Environmental Protection (NJDEP) and Environmental Protection Agency (EPA) relating to the "Response to Ann Charles and Jill Monroe 12/6/2018 Site Investigation Report Comments" dated November 17, 2020 for the above referenced Site (attached).

No additional responses are included for the following comments since the NJDEP/EPA deemed the initial response acceptable:

"Ann Charles RTC"

- Comment 1
- Comment 2
- Comment 3

"Jill Monroe RTC"

- Comment 2B

- Comment 2C
- Comment 2D
- Comment 3B
- Comment 4A
- Comment 4B
- Comment 5
- Comment 6
- Comment 7

NJDEP Comments & Earth Systems/Hess Responses (Ann Charles)

NJDEP Comment 4: The response is accepted for the following areas of concern (AOCs): AOC 4, AOC 16A, AOC 20, AOC 40, AOC 41, AOC 42, AOC 45, AOC 51, AOC 65, AOC 66, AOC 81, AOC 83, AOC 91, AOC 92, AOC 100, AOC 105, AOC 106, AOC 108, AOC 114, AOC 115.

- AOC 67, Colonial Pipeline; Historic spills, AOC 7 Colonial Pipeline, and AOC 68-72, Various Pipelines: The Department does not concur with the response for these AOCs. Hess states "As part of the Conceptual Site Model (CSM) that is currently being prepared for the Site, all underground pipelines will be evaluated as potential preferential pathways for Site impacts. However, any releases from the third party owned pipeline will not be addressed as part of the ISRA investigation of the Site pursuant to NJDEP direction since they are not the responsibility of Hess." The Department has no written record of this direction and a copy of an associated transcript should be provided for review. Also, Hess must show substantiate evidence of any historic operations, releases, historic spills, and discharges that are associated with a third party in order to warrant no investigation.

Furthermore, all historic operations, releases, historic spills, and discharges associated with Hess must be addressed.

Earth Systems/Hess Response 4: Hess continues the investigation of all Site impacts. If impacts appear to be related to third party pipelines, Hess will collect all of the relevant information regarding the potential date and volume of the release and communicate that with the agencies as well as the third party. Hess will ensure that all Site impacts will be addressed during the final remedial action phase, including any impacts from third party pipelines.

NJDEP Comments & Earth Systems/Hess Responses (Jill Monroe)

NJDEP Comment 1: The Department finds the status descriptions of RIWs initiated and pending to be too general, particularly for the AOC 11a Administration Building area (stalled investigation), the AOC 57 area (not initiated), and other areas where LNAPL or high dissolved VOCs in ground water were identified in the SIR (schedule pending). Please update the schedule and CID with a detailed status where possible.

Earth Systems/Hess Response 1: Additional timing information will be provided in the Quarterly and Semi-annual Reports regarding the status of the investigation of all Areas

of Concern (AOCs) in general and the above referenced AOCs in particular. The CID, which is a “living” document will continue to be updated as new data and information is collected. This information will be included where appropriate.

NJDEP Comment 2A: The response is conditionally accepted, based on further evaluation and analysis, concerning pipeline construction and analytical parameters.

Notes on conditional acceptance:

- PA/SI recommendations of “No RI” will be modified to reflect further evaluation in the CID.
- AOC 67-72 and AOC 98: all known construction information on petroleum pipelines and storm water and process sewer lines will be provided (invert depth, diameter) as part of the conceptual site model (CSM) to evaluate potential preferential pathways.
- The 1995 CMP included a lot of information on process and stormwater piping. If information on regional petroleum pipelines, or any other pipeline not installed by Hess, is not “known” to Hess at this time, that information must be sought from the pipeline owner.
- Additional analyses at AOCs: AOCs (including AOC 42) will be reviewed for the need for alcohol analytical methods. Limited areas of the site will need to be evaluated for additional analyses, e.g., refining areas, fuel additive storage/distribution locations, etc., for parameters that could be present that cannot be quantified by the alcohol, VOC, SVOC, TAL metals, and PFAS-compound analytical methods.

Earth Systems/Hess Response 2A: Regarding Site pipelines, all relevant information will be requested from third party owners or operators of these referenced infrastructures.

Hess requests additional clarification on what parameters the NJDEP/EPA would like included in the investigation of the AOCs specified above. The parameters currently selected/proposed include the likely contaminants of concern for each AOC, which usually include the following: Target Compound List Volatile Organic Compounds (TCL VOCs), TCL Semi-Volatile Compounds (TCL SVOCs), Target Analyte List Metals (TAL Metals), Extractable Petroleum Hydrocarbons (EPH), general chemistry, and tentatively identified compounds (TICs). Samples from select areas of the Site may also be analyzed for Poly-chlorinated Biphenyls (PCBs) as appropriate. Please specify exactly what additional parameters you are referencing above.

NJDEP Comment 2E: Clarification on the Department’s comment: The comment spoke to making sure that the soil sample parameters outside of the AOC 5 aeration basins would include parameters appropriate to assess any impacts from the staged materials prior to use for closure, such as if staged materials included catalyst fines or another waste material at any time. The information provided in the response will be used in the review of the AOC 5 closure report, along with information itemized under Section 5.5. in the Specific AOC Comments attachment to the SIR review.

Clarify if any materials other than clean fill, quarry stone, etc. were staged outside of the aeration basins that need to be evaluated in soil sampling outside of the unit.

Earth Systems/Hess Response 2E: A review of historic reports will be conducted to determine the types of material that may have potentially been stored outside of AOC 5. However, if no information can be located; what soil and groundwater sampling parameters will be required by the NJDEP/EPA to close out this issue?

NJDEP Comment 3A: Response 2A put the AOCs that were not going to be further investigated into “further evaluation”. Response 3A states that all AOCs will be “holistically” evaluated through the site remedial investigation workplans (RIWs) for additional soil or ground water sampling at any specific AOC. As worded, it is not clear that the investigation at each AOC will meet the Technical Requirements for Site Remediation.

Clarify that investigations at each AOC will meet the Technical Requirements for Site Remediation.

Earth Systems/Hess Response 3A: The investigation of all Site AOCs will continually and consistently meet the Technical Requirements for Site Remediation.

Should you have any questions or require additional clarification or information, please contact me at 732-739-6444 or via e-mail at ablake@earthsys.net. If you have any questions relating to the project and schedule moving forward, you can also contact Mr. John Schenkewitz of Hess Corporation at 609-406-3969.

Sincerely,

A handwritten signature in blue ink that reads "Amy Blake" with a long horizontal flourish extending to the right.

Amy Blake
Sr. Project Manager

- c. Ms. Julia Galayda, NJDEP Case Manager (via email/Sharefile)
Mr. John Schenkewitz – Hess Corporation (via e-mail)
Mr. Rick Ofsanko – Earth Systems (via e-mail)
Mr. John Virgie – Earth Systems (via e-mail)